

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF NEW JERSEY**

E. ALLEN REEVES, INC.

Plaintiff,

v.

MICHAEL GRAVES & ASSOCIATES,
INC.

Defendant.

MICHAEL GRAVES & ASSOCIATES,
INC.

Counterclaimant,

v.

E. ALLEN REEVES, INC.

Counterdefendant.

MICHAEL GRAVES & ASSOCIATES,
INC.

Third Party Plaintiff,

v.

DAVID CHOU & ASSOCIATES; KELTER
& GILLIGO CONSULTING ENGINEERS;
FISHER MARANTZ STONE, INC.; THE
ARTS COUNCIL OF PRINCETON; SAL
ARNONE; JOHN DOES 1-50,

Third Party Defendants.

: **CIVIL ACTION**

: **NO: 3:10-CV-01393-JAP-TJB**

R E C E I V E D
JUL - 5 2012
AT 8:30 WILLIAM T. WALSH M
CLERK

JOINT STIPULATION TO EXTEND DEADLINES

Plaintiff, E. Allen Reeves, Inc. ("Reeves"), Defendant/Third-party Plaintiff, Michael Graves & Associates, Inc. ("Graves") and Third-party Defendants David Chou & Associates ("Chou"), Kelter & Gilligo Consulting Engineers ("K&G"), The Arts Council of Princeton ("ACP") and Sal Arnone, (collectively referred to herein as the "Parties"), hereby stipulate as follows:

1. The Close of Factual Depositions in the instant matter is currently scheduled for June 29, 2012.

2. The Parties are currently engaged in finalizing the schedule of depositions of fourteen (14) party witnesses and one (1) third-party witness, including coordinating the schedules of attendance for counsel of the parties.

3. Therefore, the Parties, by stipulation and subject to approval of the Court, hereby request that the Court extend the Close of Factual Depositions established by this Court's January 5, 2012 Case Management Order until August 31, 2012.

4. Further, the Parties, by stipulation and subject to approval of the Court, hereby request that the Court extend the deadline for Affirmative expert reports to September 7, 2012, the deadline for Rebuttal expert reports to October 12, 2011 and the deadline for Third-party rebuttal expert reports to November 16, 2012.

5. The Case Management Order currently states that "[e]xtensions to extend discovery beyond [the] dispositive motion [deadline] date [of December 14, 2012] must meet manifest injustice standard if denied."

6. This deadline has not yet passed and the parties are not requesting an extension to discovery beyond said December 14, 2012 deadline.

7. This extension shall not affect any other deadlines set forth in the Court's January 5, 2012 Case Management Order. ★

COHEN SEGLIAS PALLAS
GREENHALL & FURMAN, P.C.

MARSHALL DENNEHEY WARNER
COLEMAN & GOGGIN

By: /s/ Wendy R. Bennett, Esquire
Jason A. Copley, Esquire
Wendy R. Bennett, Esquire
30 South 17th Street, 19th Floor
Philadelphia, PA 19103
Attorneys for E. Allen Reeves, Inc.
Date: July 3, 2012

By: /s/ Raymond J. Michaud, Esquire
John H. Osorio, Esquire
Raymond J. Michaud, Esquire
200 Lake Drive East, Suite 300
Cherry Hill, NJ 08002
Attorneys for Michael Graves & Associates
Date: July 3, 2012

★ The status telephone call set for August 21, 2012 is rescheduled September 12, 2012 at noon. Plaintiffs shall initiate the call.

O'CONNOR KIMBALL, LLP

DALY LAMASTRA & CUNNINGHAM

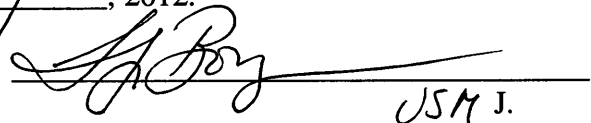
By: /s/ Michael S. Soule, Esquire
Glen D. Kimball, Esquire
Michael S. Soule, Esquire
51 Haddonfield Road, Suite 330
Cherry Hill, NJ 08002
Attorneys for David Chou & Associates
Date: July 3, 2012

By: /s/ John E. Lamastra, Esquire
John E. Lamastra, Esquire
3 Mountain View Road
P.O. Box 1622
Warren, NJ 07061
*Attorneys for The Arts Council of Princeton
and Sal Arnone*
Date: July 3, 2012

THOMPSON, BECKER & BOTHWELL,
LLC

By: /s/ Kevin M. Bothwell, Esquire
Kevin M. Bothwell, Esquire
10 Melrose Avenue
Woodcrest Pavilion
Suite 100
Cherry Hill, NJ 08003
*Attorneys for Kelter & Gilligo Consulting
Engineers*
Date: July 3, 2012

SO ORDERED, this 5 day of July, 2012.


JSM J.

ORDER ON ORAL MOTION